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*Attorney for Defendant, Gilbert R. Rousseau*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

GILBERT R. ROUSSEAU,

Defendant.

CASE NO. 2:16-cr-00097-KJD-EJY

**STIPULATION AND ORDER TO CONTINUE SENTENCING (FIFTEENTH REQUEST)**

**IT IS HEREBY STIPULATED** by and between Defendant, Gilbert R. Rousseau, by and through his counsel, Paola M. Armeni, Esq., of the law firm of Clark Hill PLLC and the Plaintiff, United States of America, by and through Jason M. Frierson, United States Attorney, and Daniel J. Cowhig, Assistant United States Attorney, that the sentencing hearing, which is currently scheduled for December 13, 2022, at 12:00 p.m., be vacated and rescheduled to a day and time convenient to the Court but not earlier than ninety (90) days.

This Stipulation is entered into for the following reasons:

1. Sentencing in this matter is currently scheduled for December 13, 2022, at 10:00 a.m. Therefore, Mr. Rousseau's Sentencing Memorandum and Formal Objections are currently due on December 6, 2022.

2. Paola M. Armeni was appointed by this Court as counsel for Mr. Rousseau on November 16, 2022.

1       3. As of the date of this stipulation counsel has not received any documents related to the  
2 case. Counsel has been in contact with AUSA Cowhig who is in the process of collecting  
3 documents to provide to the defense.

4       4. Defense counsel will require further time to explore any and all issues pertinent to  
5 sentencing, including consultation with Mr. Rousseau and the preparation of a sentencing  
6 memorandum on his behalf.

7       5. Mr. Rousseau has appeared in this case, and is in not custody and, along with the  
8 government, agrees to this continuance.

9       6. The additional time requested herein is not sought for purposes of delay and the denial of  
10 this request for a continuance could result in a miscarriage of justice.

11       7. Federal Rule of Criminal Procedure 32(b)(2) permits this Court to continue a sentencing  
12 hearing for good cause. Good cause exists in this case.

13       8. For all the above-stated reasons, the ends of justice would be best served by a continuance  
14 of the sentencing hearing.

15       9. This is the fifteenth request for a continuance of the sentencing hearing.

16 JASON FRIERSON  
17 UNITED STATES ATTORNEY  
DISTRICT OF NEVADA

CLARK HILL PLLC

18 DATED this 28<sup>th</sup> day of November, 2022.

DATED this 28<sup>th</sup> day of November, 2022.

19 /s/ Daniel J. Cowhig  
20 DANIEL J. COWHIG.  
21 Assistant United States Attorney  
22 Attorney for Plaintiff,  
UNITED STATES OF AMERICA

/s/ Paola M. Armeni  
PAOLA M. ARMENI  
Attorney for Defendant,  
GILBERT R. ROUSSEAU

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

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**FINDINGS OF FACT, CONCLUSION OF LAW AND ORDER**

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court hereby finds that:

**CONCLUSIONS OF LAW**

Based on the fact that counsel has agreed to a continuance, the Court hereby concludes that:

1. Sentencing in this matter is currently scheduled for December 13, 2022, at 12:00 p.m. Therefore, Mr. Rousseau's Sentencing Memorandum and Formal Objections are currently due on December 6, 2022.

2. Paola M. Armeni was appointed by this Court as counsel for Mr. Rousseau on November 16, 2022.

3. As of the date of this stipulation counsel has not received any documents related to the case. Counsel has been in contact with AUSA Cowhig who is in the process of collecting documents to provide to the defense.

4. Defense counsel will require further time to explore any and all issues pertinent to sentencing, including consultation with Mr. Rousseau and the preparation of a sentencing memorandum on his behalf.

5. Mr. Rousseau has appeared in this case, and is in not custody and, along with the government, agrees to this continuance.

